

October 12, 2006

Bob Gill
Stationary Source Compliance Program Manager
WDEQ-Air Quality Division
122 W. 25th Street
Cheyenne, WY 82002

RE: Submittal of Compliance Reports for "B" Calciner, AQD #17 per MD-995

Dear Bob:

Enclosed you will find the Compliance Test Reports for the "B" Calciner, AQD #17. The testing was conducted as required by Condition 8 of MD-995 issued April 6, 2004. Condition F3 of Operating Permit 3-0-126-2 stipulates interim emission limits if "B" Calciner is converted to coal-firing prior to the "A" Calciner. These limits were based on one calciner operating on coal and the other on gas. However, since the NO_X testing was conducted in the "B" Calciner duct prior to the common stack, and the PM, SO₂, and NH₃ testing was done on the common stack while the "A" Calciner was not operating, we compared test results to one half of the coal-firing permit limits. Compliance was demonstrated for all pollutants.

The NO_X CEM systems on both the "B" Calciner duct and the "A" and "B" Calciner common stack, AQD #17 were certified between June 13 and September 15, 2006. The certification will be submitted under separate cover. A 30 day test was conducted on the "B" Calciner with the certified CEM system from June 23 to July 23, 2006. A copy of those results is enclosed; the averages during the time period were 0.255 lb/MMBtu and 41.5 pph NO_X. These results confirm compliance with the 0.29 lb/MMBtu and one half of the 116 pph NO_X limit (58 pph).

Stack testing for PM, SO₂, and NH₃ was conducted by Optimal Air Testing Services. The Method 5/202 testing resulted in 2.53 pph PM, compared to 20.6 pph (one half of the 41.1 pph PM limit). The SO₂ results were negligible at 1.4 ppmdv, which equates to 1.0 pph, or 0.007 lb/MMBtu. The urea injection rate during the NH₃ testing was 4.8 gph, with results of 11.2 ppmdv, or 2.2 pph of NH₃ slip.



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A certification by the responsible official, Ronald O. Hughes, General Manager, is also included. If you have any questions concerning the test results, please contact me at 872-6571.

Respectfully submitted, SOLVAY CHEMICALS

Dolly A. Potter

Environmental Services Supervisor

Enclosures

cc: Tony Hoyt



Compliance Reports for "B" Calciner, AQD #17 per MD-995 October 12, 2006

"I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this report are true, accurate, and complete."

Name: Ronald O. Hughes

Signature: 72.4 —

Title: Resident Manager

Date: 10 /15/06

SOLVAY CHEMICALS, INC. AQD #17 "B" CALCINER 30 NOx COMPLIANCE AVERAGE

Date	NOx lb/mmBtu	NOx lbs/hr
1 6/23/2006	0.248	50.7
2 6/25/2006	0.242	51.0
3 6/26/2006	0.227	47.0
4 6/27/2006	0.208	46.9
5 6/28/2006	0.278	42.0
6 6/29/2006	0.305	43.7
7 6/30/2006	0.262	44.5
8 7/1/2006	0.287	44.4
9 7/2/2006	0.266	42.1
10 7/3/2006	0.272	37.2
11 7/4/2006	0.264	31.7
12 7/5/2006	0.258	29.5
13 7/6/2006	0.239	16.9
14 7/7/2006	0.239	37.2
15 7/8/2006	0.225	48.8
16 7/9/2006	0.229	46.4
17 7/10/2006	0.239	48.7
18 7/11/2006	0.211	40.8
19 7/12/2006	0.253	34.7
20 7/13/2006	0.271	45.5
21 7/14/2006	0.261	45.6
22 7/15/2006	0.269	45.2
23 7/16/2006	0.252	47.5
24 7/17/2006	0.266	38.5
25 7/18/2006	0.272	23.2
26 7/19/2006	0.270	42.9
27 7/20/2006	0.273	44.4
28 7/21/2006	0.248	44.2
29 7/22/2006	0.264	41.9
30 7/23/2006	0.265	43.3
30 Day Average	0.255	41.5